

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending 10/31/2022
(Insert date)**I - REGISTRANT**

1. (a) Name of Registrant

Paul Hastings LLP

(b) Registration Number

6743

(c) Primary Business Address

2050 M Street, N.W., Washington, DC 20036

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es) Yes ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

(b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☐ No ☒

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.3. If the registrant previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
See Appendix for Response				

(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Position	Date Ceased
See Appendix for Additional Names		

5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services

(b) During this 6 month reporting period, did any employee or individual working in any other capacity begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity?

Yes ☐ No ☒

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
Michael Fitzgerald	Partner	Petroleos de Venezuela, S.A.'s Ad-Hoc Board of Directors	05/25/2022

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing?

Yes ☒ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Foreign Principal

Petroleos de Venezuela, S.A.'s Ad-Hoc Board of Directors

Date of Termination

05/25/2022

8. Has the registrant added any new foreign principal(s)² during this 6 month reporting period?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal

Date Added

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

NSO Group

10. (a) Have the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes ☐ No ☐ N/A ☒Exhibit B⁴ Yes ☐ No ☐ N/A ☒

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and/or B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period? Yes ☐ No ☒

If yes, has the registrant filed an amendment to these exhibits? Yes ☐ No ☐

If no, please file the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
Petroleos de Venezuela, S.A.'s Ad-Hoc Board of Directors	Provide legal services exempt under 22 U.S.C. sections 613(d) and (g) for Petroleos de Venezuela, S.A.'s Ad-Hoc Board of Directors.
NSO Group	Provide legal advice and support for engagements with business partners, government officials, and other stakeholders about NSO's technology. Distribute informational materials to U.S. Department of State.

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

See Appendix for Response

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
NSO Group	05/23/2022	Lisa Peterson/US State Department	Letter and position paper.	Provide support for NSO's contact with US State Department regarding the Export Controls and Human Rights Initiative.

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services
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⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

14. (a) **RECEIPTS-MONIES**

If no, please explain why no monies were received.

\$	2.00
<hr/>	
Total	

If no, please file the required Exhibit D.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain why no disbursements were made.

Petroleos de Venezuela, S.A.'s Ad-Hoc Board of Directors: No monies were disbursed or expended in connection with registrable activity. Paul Hastings LLP has performed legal services exempt under 22 U.S.C. sections 613(d) and (g).

NSO Group: No monies were disbursed or expended in connection with registrable activity. Paul Hastings LLP has performed legal services exempt under 22 U.S.C. section 613(d) and (g).

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
Petroleos de Venezuela, S.A.'s Ad-Hoc Board of Directors				None	
NSO Group				None	

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
Petroleos de Venezuela, S.A.'s Ad-Hoc Board of Directors				None
NSO Group				None

(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
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10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes ☒ No ☐

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

NSO Group

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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Total

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- | | | | |
|--|---|---|---|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input checked="" type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input checked="" type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social media websites URL(s): _____ | | | |
| <input type="checkbox"/> Other (specify) _____ | | | |

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- | | | |
|---|---|---|
| <input type="checkbox"/> Public officials | <input type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input checked="" type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Other (specify) _____ | | |

20. Indicate the language used in the informational materials:

- ☒ English ☐ Other (specify) _____

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

If no, please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☒ No ☐

12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature¹³11/30/2022Scott Flicker/s/Scott Flicker

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

11/30/22

Scott M. Flicker



Appendix
Response to Item 4(a) Attached

Item 4(a): Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? If yes, furnish the following information:

List of Persons Who Were Added As Partners/Officers/Directors

Paul Hastings LLP

NEW HIRES

	Last Name	First Name	Office	Title	Start Date	Country of Citizenship
	Freedman	Rob	New York	Non-Equity Partner	5/14/2022	United States
	Padres	Alexandro M.	New York	Partner	5/14/2022	Mexico/United States
	Tan	Greg	New York	Partner	5/14/2022	Singapore
	Clarke	Pablo	Century City	Partner	5/27/2022	United States
	Gray Tucker	Jonice	Washington, D.C.	Partner	6/1/2022	United States
	Previn	Matthew	New York	Partner	6/1/2022	United States
	Hall	Kari	Washington, D.C.	Non-Equity Partner	6/1/2022	United States
	Mahler	Aaron	Washington, D.C.	Non-Equity Partner	6/1/2022	United States
	Gallardo	Eduardo	New York	Partner	6/9/2022	United States
	Cartwright	Tom	London	Partner	6/15/2022	United Kingdom
	Weitzman	Avi	New York	Partner	7/1/2022	United States
	Anderson	Ross	London	Partner	7/16/2022	United Kingdom
	Chopra	Karan	London	Partner	7/16/2022	United Kingdom
	Nurmohamed	Mo	London	Partner	7/16/2022	United Kingdom
	Raeburn	Jason	London	Partner	8/15/2022	United Kingdom

DEPARTURES

	Last Name	First Name	Office	Title	Withdrawal Date	Country of Citizenship
	Kartheiser	Robert	New York	Partner	6/3/2022	United States
	Simonis	John F.	Orange County	Non-Equity Partner	6/10/2022	United States
	Stone	Peter M.	Palo Alto	Partner	7/16/2022	United States
	O'Sullivan	Ronan P.	London	Partner	7/28/2022	Ireland
	Webb	Jeffrey	Los Angeles	Partner	7/31/2022	United States
	Smith	Ted	Atlanta	Partner	8/11/2022	United States
	Sotomayor	Marisa	New York	Partner	8/11/2022	United States
	Viklund	David	New York	Partner	8/11/2022	United States
	Kitchen	Richard	London	Partner	8/13/2022	Ireland
	Rabbitt-Tomita	Jason	Palo Alto	Partner	8/16/2022	United States
	Malik	Thaddeus	Chicago	Partner	8/31/2022	United States
	Guberman	Phara	New York	Partner	9/12/2022	United States
	Breen	Kenneth	New York	Partner	9/12/2022	United States
	Jessen	Lars	Frankfurt	Partner	9/16/2022	Germany
	Parr	Bryan H.	Washington, D.C.	Partner	9/30/2022	United States
	Hayes	Garrett	London	Partner	10/3/2022	United Kingdom

Appendix
Response to Item 4(b) Attached

Item 4(b): Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? If yes, furnish the following information:

List of Persons Who Were Ceased As Partners/Officers/Directors

Paul Hastings LLP

NEW HIRES

	Last Name	First Name	Office	Title	Start Date	Country of Citizenship
	Freedman	Rob	New York	Non-Equity Partner	5/14/2022	United States
	Padres	Alexandro M.	New York	Partner	5/14/2022	Mexico/United States
	Tan	Greg	New York	Partner	5/14/2022	Singapore
	Clarke	Pablo	Century City	Partner	5/27/2022	United States
	Gray Tucker	Jonice	Washington, D.C.	Partner	6/1/2022	United States
	Previn	Matthew	New York	Partner	6/1/2022	United States
	Hall	Kari	Washington, D.C.	Non-Equity Partner	6/1/2022	United States
	Mahler	Aaron	Washington, D.C.	Non-Equity Partner	6/1/2022	United States
	Gallardo	Eduardo	New York	Partner	6/9/2022	United States
	Cartwright	Tom	London	Partner	6/15/2022	United Kingdom
	Weitzman	Avi	New York	Partner	7/1/2022	United States
	Anderson	Ross	London	Partner	7/16/2022	United Kingdom
	Chopra	Karan	London	Partner	7/16/2022	United Kingdom
	Nurmohamed	Mo	London	Partner	7/16/2022	United Kingdom
	Raeburn	Jason	London	Partner	8/15/2022	United Kingdom

DEPARTURES

	Last Name	First Name	Office	Title	Withdrawal Date	Country of Citizenship
	Kartheiser	Robert	New York	Partner	6/3/2022	United States
	Simonis	John F.	Orange County	Non-Equity Partner	6/10/2022	United States
	Stone	Peter M.	Palo Alto	Partner	7/16/2022	United States
	O'Sullivan	Ronan P.	London	Partner	7/28/2022	Ireland
	Webb	Jeffrey	Los Angeles	Partner	7/31/2022	United States
	Smith	Ted	Atlanta	Partner	8/11/2022	United States
	Sotomayor	Marisa	New York	Partner	8/11/2022	United States
	Viklund	David	New York	Partner	8/11/2022	United States
	Kitchen	Richard	London	Partner	8/13/2022	Ireland
	Rabbitt-Tomita	Jason	Palo Alto	Partner	8/16/2022	United States
	Malik	Thaddeus	Chicago	Partner	8/31/2022	United States
	Guberman	Phara	New York	Partner	9/12/2022	United States
	Breen	Kenneth	New York	Partner	9/12/2022	United States
	Jessen	Lars	Frankfurt	Partner	9/16/2022	Germany
	Parr	Bryan H.	Washington, D.C.	Partner	9/30/2022	United States
	Hayes	Garrett	London	Partner	10/3/2022	United Kingdom

Appendix

Response to Item 12-Description

Petroleos de Venezuela, S.A.'s Ad-Hoc Board of Directors: No Political Activity

NSO Group: Provide legal advice and support for engagements with business partners, government officials, and other stakeholders about NSO's technology. Distribute informational materials to the U.S. Department of State.

Appendix

Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
Petroleos de Venezuela, S.A.'s Ad-Hoc Board of Directors	05/25/2022	Petroleos de Venezuela, S.A.'s Ad-Hoc Board of Directors	We are reporting \$1 to reflect that no monies were received for registrable activity. Paul Hastings LLP has received fees as compensation for legal services exempt under 22 U.S.C. section 613(d) and (g) \$1.00	\$ 1.00	
Petroleos de Venezuela, S.A.'s Ad-Hoc Board of Directors	-----	-----	-----	----->	\$ 1.00
NSO Group	10/30/2022	NSO Group (Israel)	We are reporting \$1 to reflect that no monies were received for registrable activity. Paul Hastings LLP has received fees as compensation for legal services exempt under 22 U.S.C. section 613(d) and (g)	\$ 1.00	
NSO Group	-----	-----	-----	----->	\$ 1.00